

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES M. DESIDERIO, J.R.,

Plaintiff,

v.

WINNEBAGO INDUSTRIES;
FREIGHTLINER CUSTOM CHASSIS;
FREIGHTLINER CUSTOM
CHASSIS/ALLIANCE, WARRANTY
DEPT.; CATERPILLAR INC. ENGINE
DIVISION; ALLISON TRANSMISSION;
MEYERS CAMPERS,

Defendants.

:
: **CIVIL ACTION**
:

:
: **NO. 02-CV-4677**
:

FILED JAN 24 2003

:
: Assigned to:
: The Honorable Harvey Bartle, III
:

DEFENDANT CATERPILLAR INC.'S APPLICATION
FOR ADMISSION OF ATTORNEY PRO HAC VICE

Defendant Caterpillar Inc., by its undersigned counsel, hereby makes this application pursuant to Local Rule 83.5.2 for the admission pro hac vice of James H. Keale, Esquire, as counsel to Defendant Caterpillar Inc. in connection with the above referenced case. In support of this application, moving defendant avers as follows:

1. James H. Keale is a member in good standing of the Bar of the State of New Jersey. Mr. Keale represents Caterpillar Inc. in New York, New Jersey, Maryland and Pennsylvania litigation involving related issues.

2. Accordingly, moving defendant hereby files this application and respectfully requests that the Court enter the accompanying Order, formally admitting Mr. Keale pro hac vice.

WHEREFORE, defendant Caterpillar Inc. requests this Honorable Court to enter an Order in form attached hereto admitting Mr. Keale as counsel pro hac vice on its behalf for all purposes in connection with the above referenced matter.

McCarter & English
Mellon Bank Center
1735 Market Street, Suite 700
Philadelphia, PA 19103

BY: _____

A handwritten signature in black ink, appearing to read 'MB Pullano', written over a horizontal line.

Michael B. Pullano
Attorney for Defendant
Caterpillar Inc.

Date: January 24, 2003

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES M. DESIDERIO, J.R.,

Plaintiff,

v.

WINNEBAGO INDUSTRIES;
FREIGHTLINER CUSTOM CHASSIS;
FREIGHTLINER CUSTOM
CHASSIS/ALLIANCE, WARRANTY
DEPT.; CATERPILLAR INC. ENGINE
DIVISION; ALLISON TRANSMISSION;
MEYERS CAMPERS,

Defendants.

: **CIVIL ACTION**

: **NO. 02-CV-4677**

: Assigned to:
: Honorable Harvey Bartle, III

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT CATERPILLAR INC.'S
APPLICATION FOR ADMISSION OF AN ATTORNEY PRO HAC VICE**

As set forth in the foregoing Application, James H. Keale, Esquire is an attorney and a member in good standing of the Bar of the State of New Jersey. Mr. Keale represents Caterpillar Inc. in New York, New Jersey, Maryland and Pennsylvania litigation involving related issues. The admission of associate counsel is permitted pursuant to L.R. 85.3.2(b). Accordingly, the Moving Defendant respectfully requests the Court enter the accompanying Order admitting James H. Keale pro hac vice for all purposes in connection with the above-referenced matter.

Respectfully submitted,
McCarter & English

BY: 

Michael B. Pullano
Attorney for Defendant
Caterpillar Inc.

Date: January 24, 2003

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES M. DESIDERIO, J.R.,

Plaintiff,

v.

WINNEBAGO INDUSTRIES;
FREIGHTLINER CUSTOM CHASSIS;
FREIGHTLINER CUSTOM
CHASSIS/ALLIANCE, WARRANTY
DEPT.; CATERPILLAR INC. ENGINE
DIVISION; ALLISON TRANSMISSION;
MEYERS CAMPERS,

Defendants.

: CIVIL ACTION

: NO. 02-CV-4677

: Assigned to:
: The Honorable Harvey Bartle, III

AFFIDAVIT OF MICHAEL B. PULLANO

1. I am counsel of record for Defendant Caterpillar Inc. in the above-captioned matter.
2. I make this Affidavit in support of Defendant Caterpillar Inc.'s Motion for the Admission pro hac vice of attorney James H. Keale.
3. I have known Mr. Keale for 3 years, and I know him to be of good character and excellent reputation.
4. The attorney has experience in defending Caterpillar Inc. in New York, New Jersey, Maryland and Pennsylvania matters involving related issues. Caterpillar Inc. seeks to have this attorney admitted pro hac vice to participate in the defense of this case.


MICHAEL B. PULLANO

Sworn to and Subscribed before
Me on this 24th day of January

2003


Notary Public

CERTIFICATE OF SERVICE

I, Michael B. Pullano, hereby certify that on this day, a true and correct copy the within
Pro Hac Vice Motion was served, via first-class mail, to the following:

Craig Thor Kimmel, Esquire
Kimmel & Silverman, PC
30 East Butler Pike
Ambler, Pa. 19002

W. Bourne Ruthrauff, Esquire
Beth Carter, Esquire
Bennett Bricklin & Saltzburg, LLP
1601 Market Street, 16th Floor
Philadelphia, Pa. 19103

A handwritten signature in black ink, appearing to read 'MBP', is written over a horizontal line.

Michael B. Pullano

Dated: January 24, 2003

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES M. DESIDERIO, J.R.,

Plaintiff,

v.

WINNEBAGO INDUSTRIES;
FREIGHTLINER CUSTOM CHASSIS;
FREIGHTLINER CUSTOM
CHASSIS/ALLIANCE, WARRANTY
DEPT.; CATERPILLAR INC. ENGINE
DIVISION; ALLISON TRANSMISSION;
MEYERS CAMPERS,

Defendants.

:
:
: **CIVIL ACTION**
:
:
:

:
: **NO. 02-CV-4677**
:
:

: Assigned to:
: The Honorable Harvey Bartle, III
:
:
:
:

ORDER

AND NOW, this day of , 2003, upon consideration of Defendant Caterpillar Inc.'s Application for Admission of Attorney Pro Hac, it is hereby ORDERED that James H. Keale, Esquire is admitted to the practice of law before the United States District Court for the Eastern District of Pennsylvania, pro hac vice, for all purposes in connection with the above-referenced case

BY THE COURT:

J.